

Exhibit C

I. RULE 26(a)(1)(A)(i) WITNESSES

Defendants hereby disclose this list of persons who Defendants believe are likely to have discoverable information that Defendants may use to support their claims or defenses, unless solely for impeachment, based on Defendants' knowledge to date.

Name	Contact Information	Subject Matter
Dr. Anitra Beasley PPGC Independent Contractor Physician and Director of Abortion Training; Planned Parenthood Center for Choice, Inc. ("PPCFC") Independent Contractor Physician	This witness should be contacted through undersigned counsel.	May have knowledge of facts related to PPGC's and PPCFC's provision of healthcare, PPGC's Texas and Louisiana Medicaid termination, and PPGC's research agreements.
Alfred Curtis PPGC Chief Operational Officer and Chief Financial Officer	This witness should be contacted through undersigned counsel.	May have knowledge of facts related to PPGC's Texas and Louisiana Medicaid termination, Texas & Louisiana Medicaid claims, and research agreements.
Marianne DeJong Former PPGT Chief Financial Officer	This witness should be contacted through undersigned counsel.	May have knowledge of facts related to PPGT's Texas Medicaid termination and Texas Medicaid claims.
Dr. Paul Fine Former PPGC Medical Director	This witness should be contacted through undersigned counsel.	May have knowledge of facts related to PPGC's and PPCFC's provision of healthcare, PPGC's Texas and Louisiana Medicaid termination, and PPGC's research agreements.
Jeffery Palmer Former PPGC Chief Operational Officer and Chief Financial Officer	This witness should be contacted through undersigned counsel.	May have knowledge of facts related to PPGC's Texas and Louisiana Medicaid termination, Texas & Louisiana Medicaid claims, and research agreements.
Tram Nguyen PPGC Senior Director of Quality Assurance & Abortion Access	This witness should be contacted through undersigned counsel.	May have knowledge of facts related to PPGC's and PPCFC's provision of healthcare, PPGC's Texas and Louisiana Medicaid termination, and

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		PPGC's research agreements.
Dr. Regan Theiler Former Reproductive Health Research Scholar at University of Texas Medical Branch	This witness should be contacted through Erin Collins, Legal Counsel, Mayo Clinic at 507.293.7806	May have knowledge of facts related to the UTMB studies.
Sarah Wheat PPGT Chief External Affairs Officer	This witness should be contacted through undersigned counsel.	May have knowledge of facts related to PPGT's Texas Medicaid termination.

Defendants also believe that individuals currently or formerly employees are likely to have discoverable information that Defendants may use to support their claims or defenses, unless solely for impeachment, based on Defendants' knowledge to date.

Defendants also reserve the right to call any witness identified in the Plaintiffs' complaints, any witnesses that Defendants identify in response to Plaintiffs' discovery requests, and any witness that Plaintiffs identify as persons with relevant knowledge.

Dated: October 6, 2022

Respectfully submitted,

ARNOLD & PORTER KAYE SCHOLER
LLP

By: s/ Tirzah S. Lollar
 Craig D. Margolis
 Craig.Margolis@arnoldporter.com
 Tirzah S. Lollar
 Tirzah.Lollar@arnoldporter.com
 Christian Sheehan
 Christian.Sheehan@arnoldporter.com
 Emily Reeder-Ricchetti
 Emily.Reeder-Ricchetti@arnoldporter.com
 Megan Pieper

Megan.Pieper@arnoldporter.com
Alyssa Gerstner
Alyssa.Gerstner@arnoldporter.com
601 Massachusetts Ave, NW
Washington, DC 20001-3743
Telephone: +1 202.942.6127
Fax: +1 202.942.5999

Christopher M. Odell
Texas State Bar No. 24037205
Christopher.Odell@arnoldporter.com
700 Louisiana Street, Suite 4000
Houston, TX 77002-2755
Telephone: +1 713.576.2400
Fax: +1 713.576.2499

Paula Ramer
250 West 55th Street
New York, New York 10019-9710
T: +1 212.836.8474
Paula.Ramer@arnoldporter.com

Ryan Patrick Brown
Texas State Bar No. 24073967
brown@blackburnbrownlaw.com
1222 S. Fillmore
Amarillo, TX 79101
Tel: (806) 371-8333
Fax: (806) 350-7716

CERTIFICATE OF SERVICE

I hereby certify that on October 6, 2022, the foregoing Affiliate Defendants' Rule 26(a)(1) Supplemental Disclosures were served upon all counsel record by e-mail.

s/ *Tirzah S. Lollar*
Tirzah S. Lollar